

Alabama Seminar 2013

O&M MANUAL HIGHLIGHTS

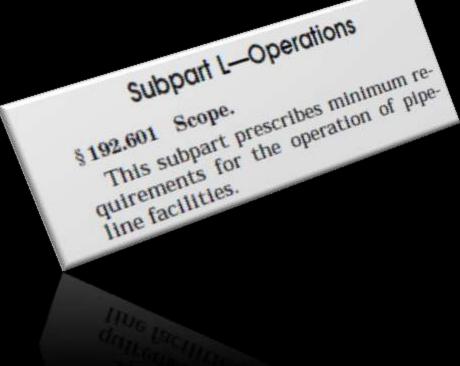




GENERAL PROVISIONS

Each pipeline must be operated according to this **SUBPART**

§192.603(a)





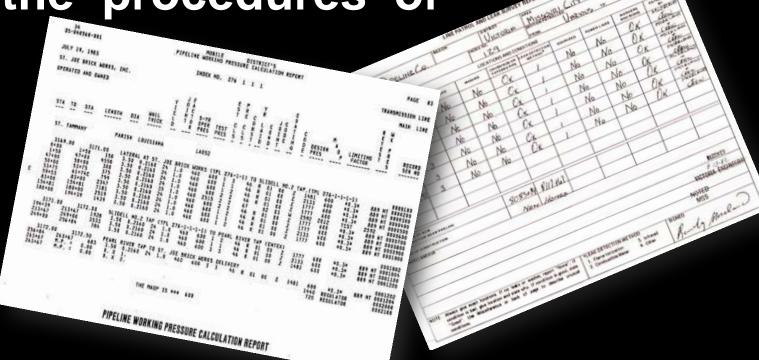


RECORDS

§192.603(b)

Keep records necessary to administer the procedures of

§192.605







RECORDS

- Life of Facility
 - Include construction, materials, repairs, MAOP information, and most corrosion records
 - Retained for active life of facility





RECORDS

- Other Records
 - Include tests, inspections, patrols, surveys and procedure reviews which prove compliance with 49 CFR 192
 - Retain for 5 years (consider IM requirements)



NOTICE OF AMENDMENT



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 25, 2011

Tater Pipeline Company Anywhere, USA

CPF 2011-XXXXII

Dear Sins

One day, a representative of the Papeline and Hazardous Materials Safety Administration (PEMSA) purmant to Chapter 601 of 49 United States Code inspected Tater Papeline Company procedures for Operations and Maintenance in Anywhere, USA.

On the basis of the inspection, PEINSA has identified the apparent inadequacies found within plans or procedures, as described below:

I. [cite the regulation and title]

[quote the regulation]

[describe the procedures in a manner that makes clear what is inadequate]

2. [cite the regulation and title]

[quote the regulation]

[describe the procedures in a manner that makes clear what is inadequate]

NOTICE OF AMENDMENT

ADMINISTRATOR of PHMSA or a **STATE AGENCY** with a 60105 Certification may require modifications to an **INADEQUATE PLAN**





§192.605

PROCEDURE MANUAL FOR OPERATIONS, MAINTENANCE AND EMERGENCIES





Each operator shall prepare and follow for each pipeline

A manual of written procedures for O&M activities and Emergency Response









 Transmission lines must include procedures for abnormal operations







 The manual must be reviewed and updated at intervals not to exceed 15 months, but at least once each calendar year

Manual prepared before operations start





 Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted







MANUAL CONSIDERATIONS

- Is it in writing?
- Is it adequate?
- Is it being followed?
- Does it apply to each pipeline system?
- Did it exist before startup?
- Is it reviewed as required?





MANUAL CONSIDERATIONS

- How are changes communicated?
- How is it kept?
- All copies same version?
- Employees trained on it?
- How do employees access it?





PROCEDURES REQUIRED

Maintenance and normal operations

• If applicable, the manual must include procedures for the following to provide safety during maintenance and operations:





OPERATING, MAINTAINING AND REPAIRING

(1) Operating, maintaining and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part







OPERATIONS, MAINTENANCE AND REPAIRS

- Training and OQ
- Maps & Records
- MAOPs
- Communications
- Line Markers
- ROW Inspections
- Valve Maintenance
- Corrosion Control Records
- Pipeline Repairs
- CRM

- Overpressure Safety Devices
- Compressors
- Regulators
- Signage
- Security of Facilities
- Smoking or Open Flames
- Accidental Ignition
- Public Education
- Damage Prevention
- Continuing Surveillance
- Odorization





CORROSION

(2) Controlling corrosion in accordance with the operations and maintenance requirements of SUBPART I of this part

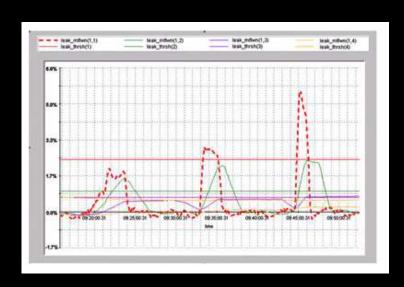


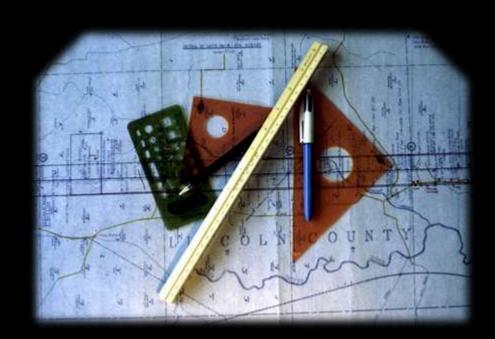




RECORDS AND HISTORY

(3) Making construction records, maps and operating history available to appropriate operating personnel









DATA FOR INCIDENTS

(4) Gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner







STARTING AND SHUTTING DOWN A PIPELINE

(5) Starting up and shutting down any part of the pipeline in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed







COMPRESSOR STATIONS - MAINTENANCE

(6) Maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service







COMPRESSOR STATIONS - OPERATIONS

(7) Starting, operating & shutting down gas compressor units

START PROCEDURE FOR 305 FROM UNIT HMI

- I. TURN ON FUEL GAS VALVE IN FUEL SKID
- 2. CLOSE SEAL OIL DRAIN VAIVE (located west side of skid above compress.)
- 3. TURN SWITCH ON PANEL TO LOCAL MANUAL
- 4. PUSH START BUTTON ON PANEL

STOP PROCEDURE FOR 305 FROM UNIT HMI

- L TURN SWITCH ON PANEL TO LOCAL MANUAL







PROCEDURE REVIEW

(8) Periodically reviewing the work done by operator personnel and modifying the procedures when deficiencies are found





UNSAFE VAPORS

- (9) Procedures about precautions to follow regarding unsafe accumulations of vapors or gas in excavated trenches
- If needed, provide breathing apparatus, rescue harness and line







HOLDERS

(10) Develop plan to test and inspect pipe - type or bottle - type holders









GAS REPORTS

(11) Respond promptly to a report of gas odor in or near a building, unless covered by emergency plan







CONTROL ROOM MANAGEMENT

(12) Implement applicable control room management procedures required by §192.631









• For transmission lines, the manual must include procedures for the following to provide safety when operating design limits have been exceeded:





(1) Responding to, investigating and correcting the cause of:

(i) Unintended closure of valves or shutdowns;









(ii) Increase or decrease in pressure or flow rate outside normal operating limits;





(iii) Loss of communications;







(iv) Operation of any safety device; and









(v) Foreseeable component malfunction, deviation from normal operation or personnel error resulting in a hazard to persons or property





SYSTEM INTEGRITY

(2) Checking at sufficient critical locations in the system to determine continued integrity and safe operation







NOTIFICATION

(3) Notifying responsible operator personnel when notice of an abnormal operation is received





ABNORMAL PROCEDURES REVIEW

- (4) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation; and
- Taking corrective action where deficiencies are found





EXCEPTIONS

- (5) Exempted from write-up of abnormal operation procedures;
- Distribution operators with transmission lines operated in conjunction with the distribution system





SAFETY - RELATED CONDITION REPORTS

Instructions for personnel to identify and report conditions that potentially may be safety - related conditions subject to reporting requirements of §191.23







ADDITIONAL PROCEDURES

The procedures required by

§192.613(a), Surveillance

§192.615, Emergency Response

• §192.617, Failure Investigation must be included

in the manual





EVIDENCE

- Copies of procedures
 - Inadequate
 - Not following
- Records of procedure reviews
- Records of inspection, tests or surveys





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